

# **EXHIBIT 79**

## **Redacted Declaration of Hunter Campbell**

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Ultimate Fighting Championship and UFC  
16

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
on behalf of themselves and all others similarly  
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

25  
26 Defendant  
27  
28

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF WM. HUNTER  
CAMPBELL IN SUPPORT OF  
ZUFFA'S MOTION FOR SUMMARY  
JUDGMENT**

1 I, Wm. Hunter Campbell, declare as follows:

2 1. I am over 21 years old and have personal knowledge of the information in this  
3 declaration. I have been employed by Zuffa, LLC ("Zuffa") since 2017 and I am currently the Chief  
4 Legal Officer and Executive Vice President of the Ultimate Fighting Championship ("UFC"). Prior  
5 to becoming the UFC's Chief Legal Officer, I was the Managing Partner of Campbell & Williams  
6 and was outside counsel to Zuffa. I have personal knowledge of the facts stated in this declaration  
7 and if called to testify, I would and could competently testify to those facts.

8 2. During my tenure as both UFC's Chief Legal Officer and outside counsel to Zuffa, I  
9 have been involved in contract negotiations with numerous athletes or their managers and agents.

10 3. Many athletes who compete in UFC events complete the terms of their contracts with  
11 Zuffa and become free agents. [REDACTED]  
[REDACTED]  
[REDACTED]

12 [REDACTED] In many instances, when it becomes clear that an  
13 agreement with the athlete will not be reached at that time, Zuffa has waived the remaining time on  
14 an exclusive negotiating period. - - - - -  
15

16 4. During free agency, athletes may negotiate new contracts with one or more MMA  
17 promoters or with other sports teams or sports promoters. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

18 [REDACTED] As described below, Zuffa has been unable  
19 or unwilling to match the offers provided by competing promoters for many of the free agent  
20 athletes.  
21  
22

23 5. On May 12, 2018, Lyoto Machida, the former UFC Light Heavyweight champion,  
24 completed his contract with the UFC when he defeated Vitor Belfort at UFC 224 by knockout. At  
25 the time of his last bout, Machida was making [REDACTED]  
26 [REDACTED]

27 6. [REDACTED]  
28 [REDACTED]

1 [REDACTED], and Zuffa waived the remaining time on its exclusive negotiating period.

2 7. [REDACTED]

5 8. [REDACTED]

7 9. On June 20, 2018, Zuffa advised Machida that it had decided not to exercise its right  
8 to match Bellator's offer to Machida. Machida subsequently accepted an offer to compete for  
9 Bellator.

10 10. In the past few years, many other highly-ranked or well-known athletes have entered  
11 free agency following the completion of their contracts with the UFC, including Gegard Mousasi,  
12 Phil Davis, Ryan Bader, Roy Nelson, Misha Cirkunov, Kyoji Horiguchi, Lorenz Larkin, Rory  
13 MacDonald, Benson Henderson, Matt Mitrione, Aljamain Sterling, Rick Story, Michael McDonald,  
14 and John Dodson, among others.

15 11. During the free agency period, Zuffa entered into new agreements with Cirkunov,  
16 Sterling and Dodson, while the remaining athletes left to compete for another promoter.

17  
18 I declare under penalty of perjury under the laws of the United States of America that the  
19 foregoing facts are true and correct. Executed this 30<sup>th</sup> day of July, 2018 in Las Vegas, NV.

20  
21 

22 Wm. Hunter Campbell